

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**DECLARATION OF CHRISTOPHER A. SEEGER IN
OPPOSITION TO MOTION TO STAY ENFORCEMENT OF
ATTORNEYS' FEE ALLOCATION ORDER PENDING APPEAL**

CHRISTOPHER A. SEEGER declares, pursuant to 28 U.S.C. § 1746, based upon his personal knowledge, the following:

1. I am a founding member of the law firm of Seeger Weiss LLP and was appointed by the Court in 2012 as a member of the Plaintiffs' Executive Committee and thereafter to serve as Plaintiffs' Co-Lead Counsel (ECF Nos. 64, 72). I was the principal negotiator and architect of the Class Action Settlement dated June 25, 2014, between the Plaintiff Class and the Defendants National Football League and NFL Properties LLC (ECF No. 6073-2), which was preliminarily

approved on July 7, 2014 (ECF No. 6084, ¶ 3(b)), amended as of February 13, 2015 (ECF No. 6481-1), and finally approved on April 22, 2015 (ECF Nos. 6509-10). Upon these approvals, I was appointed to serve and later confirmed to serve as Co-Lead Class Counsel.

2. I make this Declaration in opposition to the filed on May 25, 2018 (ECF No. 10022) by the Alexander Objectors and the law firm of Lubel Voyles, LLP, seeking a stay pending appeal of the Court's May 24, 2018 Explanation and Order (ECF No. 10019).

3. At my direction, an attorney from my office has consulted with the office of the Court-appointed Administrator of the Attorneys' Fees Qualified Settlement Fund, The Garretson Resolution Group, Inc. ("GRG").

4. Wiring instructions that GRG sent to each firm or counsel designated for distributions under the Court's May 24, 2018 Explanation and Order require a written commitment by the recipient to return the funds in the event of a reversal or modification of the Court's common benefit attorneys' fees decisions, including on appeal.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 31st day of May, 2018.

/s/ Christopher A. Seeger

CHRISTOPHER A. SEEGER
Co-Lead Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all counsel of record via the Court's ECF system on May 31, 2018.

/s/ Christopher A. Seeger
Christopher A. Seeger